Daniel J. Ferretti

Texas Bar No.: 24096066 Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 1301 McKinney, Suite 3700 Houston, Texas 77010 dferretti@bakerdonelson.com

Telephone: (713) 650-9700 Facsimile: (713) 650-9701

Attorney for Creditors, Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

S
Chapter 11

S
HIGHER GROUND EDUCATION,
INC., et al., 1

Debtors.

S
Case No. 25-80121-11 (MVL)

S
(Jointly Administered)

NOTICE OF CANCELLATION OF HEARING ON MOVANTS' MOTION FOR RULE 2004 EXAMINATIONS OF EB5AN, LLC, F/K/A EB5 AFFILIATE NETWORK, LLC

PLEASE TAKE NOTICE that the hearing on Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora's (the "Movants") Motion for Rule 2004 Examinations of EB5AN, LLC, f/k/a EB5 Affiliate Network, LLC [Docket No. 617] (the "Motion") scheduled for December

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.



Case 25-80121-mvl11 Doc 704 Filed 11/25/25 Entered 11/25/25 17:19:25 Desc Main Document Page 2 of 3

3, 2025 at 9:30 a.m. before the Honorable Michelle V. Larson, United States Bankruptcy Judge, has been canceled. The hearing on the Motion is being reset by separate notice filed contemporaneously herewith.

Dated: November 25, 2025 Respectfully submitted,

By: /s/ Daniel J. Ferretti

DANIEL J. FERRETTI

State Bar No. 24096066

Fed. I.D. No. 11200233

BAKER, DONELSON, BEARMAN,

CALDWELL & BERKOWITZ, PC

1301 McKinney St., Suite 3700

Houston, Texas 77010

Telephone: (713) 650-9700

Facsimile: (713) 650-9701

dferretti@bakerdonelson.com

Attorney for Creditors, Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora

CERTIFICATE OF SERVICE

The undersigned certifies that on November 25, 2025, a true and correct copy of the foregoing document was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system, including but not limited to counsel for the Debtor, the Official Committee of Unsecured Creditors, and the U.S. Trustee, and on the parties below via First-Class, United States mail, postage prepaid:

Debtor: Higher Ground Education, Inc., <i>et al.</i> 1321 Upland Dr. PMB 20442 Houston, Texas 77043	Examinee: EB5AN, LLC Registered Agents Inc. 7901 4th Street North Suite 300 St. Petersburg, FL 33702
	EB5AN, LLC 5500 Military trail Suite 22-260 Jupiter, FL 33458
	EB5AN, LLC c/o Daniel Lundy Chiesa Shahinian & Giantomasi PC 11 Times Square, 34 th Floor New York, NY 10036
	EB5AN, LLC c/o Christopher M. Candon Sheehan Phinney 1000 Elm Street, 17th Floor Manchester, NH 03101

/s/ Daniel J. Ferretti

Daniel J. Ferretti